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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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Arizona Corporation Commission

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IN THE MATTER OF THE REVIEW AND
POSSIBLE REVISION OF ARIZONA
UNIVERSAL SERVICE FUND RULES, ARTICLE
12 OF THE ARIZONA ADMINISTRATIVE
CODE.

Docket No. RT-00000H-97-0137

IN THE MATTER OF THE INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

Docket No. T-00000D-00-0672

COX ARIZONA TELCOM'S RECOMMENDATIONS ON DOCKET PROCEDURE

Cox Arizona Telcom, LLC ("Cox"), through undersigned counsel, submits its recommendations on how these dockets should proceed. These comments are responsive to Staff's request for comment by the parties at the July 27, 2009 workshop.

It is clear that after two workshops conducted by Staff to discuss intrastate access charge reform and issues pertaining to the Arizona Universal Service Fund, no consensus by the parties has or can be reached. The issues surrounding these dockets are complex and cannot be fixed on a state-by-state basis. As such, Cox continues to believe that an examination of intrastate switched access rates in Arizona should await further action by the FCC on overarching inter-carrier compensation reform. With the recent confirmation of the remaining two FCC Commissioners, there is now a full compliment of Commissioners on board that will be looking at the pending dockets on Intercarrier Compensation¹ and setting the foundation for federal reform.

¹ See In the Matter of Universal Service Contribution Methodology, WC Docket No. 06-112; In the Matter of the High-Cost Universal Service Support and Federal-State Joint Board on Universal Service, WC Docket 05-337, CC

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1 This new federal reform will have a direct impact on the intra-state rates. Pressing forward with
2 state proceedings at this time while federal action is pending will have the potential to result in
3 conflicting reforms while taxing not only staff's limited resources but industry's as well. As the
4 Staff's resources are already stretched with further budget cuts looming, expending considerable
5 time on a docket that will ultimately have to be amended once federal action takes place does not
6 seem to be in the best interest of all parties involved. Cox continues to advocate that waiting until
7 the FCC takes action is the best course of action as it will prevent all parties from expending
8 unnecessary time and resources on a possibly conflicting state proposal.

9 If the Commission feels compelled to move forward at this time, Cox reiterates its January
10 23, 2009 comments regarding what elements the Commission should consider in addressing the
11 access charge reform.

12 RESPECTFULLY SUBMITTED this 10th day of August 2009.

13 **COX ARIZONA TELCOM, LLC**

14
15
16 By 

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22 Docket 96-45; In the Matter of Developing a Unified Intercarrier Compensation Regime, WC Docket No. 01-92; and
23 In the Matter of Access Charge Reform, CC Docket No. 96-262.
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1 **ORIGINAL** and **15 COPIES** of the
2 foregoing filed this 10th day of
3 August 2009 with:

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